



*Consulting Engineers
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December 9, 2008
(PBW Project No. 1432)

VIA OVERNIGHT COURIER

Mr. Gary Miller
Superfund Division, Region 6 (6SF-AP)
Arkansas/Texas Section
U.S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: November 2008 Monthly Status Report, Gulfco Marine Maintenance Site, Freeport,
Texas

Dear Mr. Miller:

Pursuant to Section XII, Paragraph 53 of the amended Unilateral Administrative Order (UAO) for the above-referenced Site, Pastor, Behling & Wheeler, LLC (PBW) has prepared this monthly status report on behalf of LDL Coastal Limited LP (LDL), Chromalloy American Corporation (Chromalloy) and The Dow Chemical Company (Dow). As discussed in our telephone conversation on August 2, 2005, monthly status reports for a given month will be submitted by the 15th of the following month as required in Paragraph 53 of the UAO, rather than by the 10th of the following month as indicated in Appendix 1 of the UAO. In accordance with the UAO requirements this report addresses the topics listed below:

1. Actions which have been taken toward achieving compliance with the UAO during the previous month – The following actions were taken during the previous month:
 - RI/FS site characterization activities (SOW Paragraphs 34 through 36) detailed under Task 6 of the RI/FS Work Plan including:
 - Subtask 6.5 – Validation of laboratory analysis of a groundwater sample collected from Zone C monitoring well NE4MW32C in September was completed. A letter proposing Phase 5 groundwater investigation activities was sent to you on November 12, 2008.
 - Subtask 6.9 – A draft Nature and Extent Data Report (NEDR) is currently being prepared.
 - Risk Assessment activities (SOW Paragraphs 37) detailed under Task 7 of the RI/FS Work Plan - data analysis, human health risk evaluation and ecological risk evaluation were partially completed.

2. Results of sampling, tests, modeling and all other data (including raw data) received or generated by or on behalf of Respondents during the previous month – The following data were received or generated during the previous month:
 - The validation report for the groundwater analyses described above is provided in electronic form on the enclosed DVD.
 - The updated database, including all data validated through November 30, 2008, is provided in electronic format on the enclosed DVD.
3. Actions, data and plans which are scheduled for the next two months and other information relating to the progress of work – The following actions are planned for the next two months:
 - RI/FS site characterization activities (SOW Paragraphs 34 through 36) detailed under Task 6 of the RI/FS Work Plan including:
 - Subtask 6.5 – Groundwater/NAPL investigation – to be continued through Cone Penetrometer Testing (CPT) piezometer installation, water-level measurement, groundwater sample collection, sample analyses, data validation, and data evaluation.
 - Subtask 6.9 – Preliminary Site Characterization Report – to be continued through Draft NEDR preparation.
 - Risk Assessment activities (SOW Paragraphs 37) detailed under Task 7 of the RI/FS Work Plan – to be continued through data analysis, human health risk evaluation and ecological risk evaluation.
4. Information regarding percentage of completion, all delays encountered or anticipated that may affect the future schedule for completion of the work required, and efforts made to mitigate those delays or anticipated delays – RI/FS activities are approximately 75% complete.

Thank you for the opportunity to submit this status report. Should you have any questions, please do not hesitate to contact me.

Sincerely,

PASTOR, BEHLING & WHEELER, LLC



Eric F. Pastor, P.E.
Principal Engineer

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cc: Mr. Doug McReynolds – EA Engineering, Science and Technology
Ms. Luda Voskov – Texas Commission on Environmental Quality
Mr. Brent Murray – Environmental Quality, Inc.
Mr. Rob Rouse - The Dow Chemical Company
Mr. Allen Daniels - LDL Coastal Limited, LP
Mr. F. William Mahley - Strasburger & Price, LLP
Mr. James C. Morriss III - Thompson & Knight, LLP
Ms. Elizabeth Webb - Thompson & Knight, LLC